

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc. *et al.*,¹

Debtors.

Synacor, Inc.,

Plaintiff,

v.

IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,

Defendants.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Adv. Proc. No. 23-50753 (KBO)

**STIPULATION BY AND BETWEEN PLAINTIFF AND
DEFENDANTS EXTENDING THE DEADLINE FOR THE
RULE 26(f) CONFERENCE AND PRE-TRIAL CONFERENCE**

Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.), Portal Acquisition Company, ValueVision Interactive, Inc., VVI Fulfillment Center, Inc., ValueVision Retail, Inc., JWH Acquisition Company, PW Acquisition Company, LLC, EP Properties, LLC, FL Acquisition

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Company, Norwell Television, LLC, and 867 Grand Avenue, LLC (collectively, the “Debtor Defendants”), IV Media, LLC and Innovation Ventures, LLC (collectively, the “Non-Debtor Defendants” and together with the Debtors Defendants, the “Defendants”) and the above-captioned plaintiff (the “Plaintiff”) have agreed, subject to approval of the Court, and given that the parties are in active settlement negotiations, to extend the Rule 26(f) conference and the pretrial conference originally scheduled for December 21, 2023 at 2:00 p.m. (EST) as set forth in the Summons and Notice of Pretrial Conference in the an Adversary Proceeding dated November 7, 2023 to January 23, 2024 at 9:30 a.m. (EST). All obligations attendant to the Rule 26(f) Conference pursuant to the Delaware Bankruptcy Court Local Rules, including Rules 7016-1 and 7026-3, are likewise extended.

Plaintiff, Non-Debtor Defendants, and Defendants likewise agree that the Pre-Trial Conference may be further extended upon written consent of the Stipulation Parties, which written consent may be provided by email from counsels to the parties, provided that the Plaintiff shall file a notice of any extension of the Pre-Trial Conference on the docket of this adversary proceeding.

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Dated: December 15, 2023

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Dated December 15, 2023